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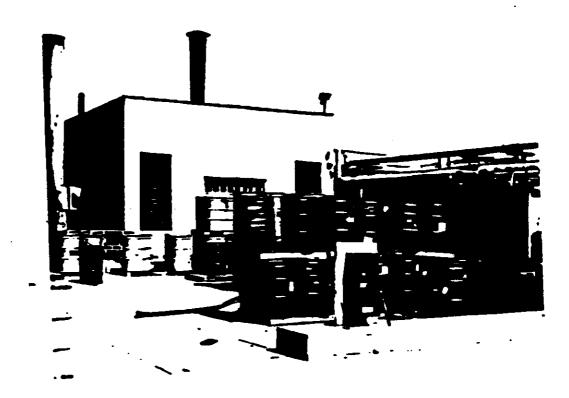
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C. SPACE FOR ADDITIONAL PROCESS CODES ON FOR DESCRIBING OTHER PROCESSES (sode "TOI"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

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V. PERCEPTION OF EASARBOUS WASTES (SEE THIS SPACE TO LIST ADDITIONAL PRO	ELSS CODES PROM	TITEM D(I) ON PAGE	.			
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F N J D 0 0 2 0 1 2 2 1 9 5 6						
V. FACILITY DRAWING All existing facilities must include in the space provided o	n page 5 a scale drawing	of the facility less instructi	ions for more de	uli).	2	
VI. PHOTOGRAPHS						
All existing facilities must include photographs (at treatment and disposal areas; and sites of future st	erial or ground—level corage, treatment or () that clearly delineate al disposal areas <i>(see instruc</i>	l existing structions for more	detail).	cisting storage,	
VII. FACILITY GEOGRAPHIC LOCATION LATITUDE (degrees, minutes, & secon	4-1	LONGIT	UDE (degroes, m	Invited A	seconds)	
40 50 19	-	LONG	74 0	5 5		
VIII. FACILITY OWNER A. If the facility owner is also the facility operator a skip to Section IX below.	s listed in Section VIII	on Form 1, "General Inform	nation", place an	"X" in t	he box to the left	and
B. If the facility owner is not the facility operator a	s listed in Section VIII	on Form 1, complete the fo	allowing Items:			
	CILITY'S LEGAL OWN	ER		2. PHO	NE NO. (area co	de & no.)
3						
1. STREET OR P.O. BOX		4. CITY OR TOWN	\$.	87. j	6. ZIP COD	<u> </u>
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IX. OWNER CERTIFICATION I certify under penelty of law that I have personal documents, and that based on my inquiry of those aubmitted information is true, accurate, and complicated including the possibility of fine and imprisonments.	e individuals immedi plote, I am aware the	ately responsible for obt	eining the info	metion,	, I believe that t	the
A. NAME (print or type) Michael J. Rudick Vice President	S. SIGNATURA	hall Ruli		DATE 1	19/86	,
X, OPERATOR CERTIFICATION					,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
I certify under penelty of law that I have persone documents, and that based on my inquiry of those submitted information is true, accurate, and comincluding the possibility of fine and imprisonment.	e individuals immedi piete. I am awere the	lately responsible for obt	aining the info	rmetion	. I believe that	the
A. NAME (print or type)	B. SIGNATURE		1	C. DATE	SIGNED	<u> </u>
EPA Form 3510-3 (8-90)	PAGE	4 OF 5			CONTINUE	ON PAGE



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NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF HAZARDOUS WASTE MANAGEMENT HAZARDOUS WASTE INSPECTION REPORT

DWM-029

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HAZARDOUS WASTE MANAGEMENT FACILITY INSPECTION REPORT

FACILITY INFORMATION FACILITY NAME: Henkel Process Chemicals FILE NUMBER: 02-05-19VHT FACILITY FILE NUMBER: REGION: N INSPECTION DATE: INCIDENT/CASE NUMBER: INSPECTION TYPE: RCRA-TSA RESPONSIBLE AGENCY CODE: INSPECTOR'S NAME: Chris FeliceTTi INSPECTOR'S AGENCY: NJOEP/ DHWM INSPECTOR'S BUREAU: _____MBE EPA ID NUMBER: NJO 662012719 Berry Ave at RT 17 N Carlstadt, NJ 07072 BLOCK: COUNTY: FACILITY PERSONNEL: OTHER STATE/EPA PERSONNEL: REPORT PREPARED BY:

REVISION: 3 Ø1/88

REVIEWED BY:

DATE OF REVIEW:

PHOTOS TAKEN:	() YES	_		
SAMPLE TAKEN:	() YES	(_Y NO		•
If yes, how ma	ny?			
NO. OF SAMPLES:	 /	NJDEP ID	#:	
MANIFESTS REVIEWED:	YES	(<u>)</u> no		
Number of Manis	ests in Co	mpliance:	12	
Number of Manif	ests Not 1	n Compliance:	Õ	•
List Manifest I	ocument Nu	mbers of Those	Manifests Not in	Complience:

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On 3/13/90 I conducted a RCRA inspection at Henkel Corp. in Carlstadt, NJ.

The facility representatives were Stephen Mitchell, and Herbert Talamini. With me on this inspection was Jodie Stein, NJDEP/BME. The last inspection on this facility was conducted on 11/29/88.

This Henkel facility is a specialty chemicals manufacturing plant, primarily making wetting and dispersing agents for use in the textiles, construction, and agricultural industries. The primary products manufactured here are phenolic/cresylic resins, and naphthaline sulfonics, used for the wetting agents. The facility has been operating as an existing status TSD facility, but is now gradually shutting down its operations, and undergoing joint RCRA/ECRA closure. The company is currently only making the wetting agents and some specialty chemicals; the natural gum processes have been shut down since July of '89.

Chemical processes used in making the materials consist of blending components in large reactor vessels, and conducting the sulfonation reactions under strict temperature control monitoring, and then filtering and pH adjusting of the material. The finished product is either packaged as a liquid or dried and packaged as a powder.

Normal process operations do not generate any hazardous waste.

Historically the company's waste has come from off-spec/out dated chemicals, and from spill cleanup associated with maintenance of the equipment and pipes. All waste gets stored in the approved waste storage pad.

With the pending shut down of operations, the company has disposed of all waste materials, and initiated closure of the the storage pad. The facility tour revealed that there was no waste being stored on site at this time. Mr. Talamini stated that this is due to the shut down and the use of better management practices on the existing product lines.

The required documentation was reviewed. In lieu of the financial assurance required for the closure plan (cost estimated at \$77,000) the company was allowed to incorporate this with the surety bond required by the ECRA closure. Financial documents for the ECRA closure show fund of approximately 8 million dollars available to Henkel for closure of NJ facilities. This was allowed by BHWE, according to DEP site engineer Jean Adragna. The manifests were found to be in good order. The only deficiency was found to be a lack of contingency plan drills. Mr. Talamini stated that this was due to the lack of cooperation from the local fire department, and I reminded him the Henkel was required to conduct the drills even if the fire department did not want to participate. An NOV was issued for this problem.

All required LDR documentation was complete and accurate. No referral to USEPA is necessary for Land Ban enforcement.

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SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS	
	
	
	<u> </u>

HAZARDOUS WASTE FACILITY STANDARDS

YES NO N/A

MANIFESTS

7:26-7.4(a)4	Does each manifest have the following information? Please circle the elements missing and obtain a copy of the incomplete manifests. (List those manifests that are deficient on G-1).			_
7:26-7.4(a)4i	The generator's name, address and phone number.	✓	_	_
7:26-7.4(a)411	The generator's EPA ID number.	\checkmark	_	_
7:26-7.4(a)4iii	The hauler(s) name, address phone number and NJ registration.	<u>/</u>		
7:26-7.4(a)41v	The hauler(s) EPA ID number.	\underline{V}		_
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility.	\checkmark		_
7:26-7.4(a)4vi	The TSF's EPA ID number.	\checkmark	_	
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility.	<u>/</u>	_	_
7:26-7.4(a)4v11	The name, type and quantity of hazardous waste being shipped, including such particulars as may be required regarding same?	<u> </u>		
7:26-7.4(a)4viii	Special handling instructions and any other information required on the form to be shipped by generator?	<u>/</u>	_	

YES NO N/A 7:26-7.4(3) Did the generator describe all N.O.S. wastes in Section J? 7:26-7.4(a)ix When shipping hazardous waste to a waste reuse facility does the generator enter the waste reuse facility I.D. # in the section G of the Uniform Manifest? 7:26-7.4(2)5 Before allowing the manifested waste to leave the generator's property, did the generator: 7:26-7.4(a)51 Sign the manifest certification by hand? 7:26-7.4(a)511 Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest? 7:26-7.4(a)5111 Retain one copy and forward one copy to the state of origin and one copy to the state of destination? 7:26-7.4(a)51v Provide the required numbers of copies for: generator, each hauler, owner/operator of the designated facility, as well as one copy returned to the generator by the facility owner/operator? 7:26-7.4(a)5v Give the remaining copies of the manifest form to the hauler? 7.26-7.4(f)Has the generator maintained facility records for three (3) years? (Manifest(s), exception report(s) and waste analysis) 7:26-7.4(h)1 Has the generator received signed copies of portion B (from the TSD facility) of all manifests for waste shipped off site more than 35 days ago? 7:26-7.4(h)1 If not: Did the generator contact the hauler and/or the owner or operator of the TSDF and the NJDEP at (609) 292-8341 to inform the NJDEP of the situation? 7:26-7.4(h)2 Have exception reports been submitted to the Department covering any of

these shipments made more than 45

days ago?

7:26-9.4(b)	Waste Analysis	
7:26-9.4(b)11	Is there a detailed chemical and physical analysis of a representative sample of the waste(s) or each waste? (At a minimum, this analysis most contain all the information necessary for proper treatment storage or disposal of the waste).	<u> </u>
7:26-9.4(b)1111	Does the character of the waste handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? Check only one:	
	Waste characteristics vary: All waste(s) are basically the same: Company treats all waste(s) as hazardous:	
7:26-9.4(ъ)2	Is there a written waste analysis plan at the facility?	<u> </u>
	Does it contain:	
7:26-9.4(2)1	Parameters for which each hazardous waste stream will be analyzed including constituents listed in NJAC 7:26-8.16 and the rational for the selection of these parameters?	<u> </u>
7:26-9.4(b)211	The test methods which will be used to test for these parameters?	<u> </u>
7:26-9.4(b)2111	The sampling method which will be used to obtain a representative sample of the waste to be analyzed?	<u> </u>
7:26-9.4(b)21 v	The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date?	<u> </u>
7:26-9.4(b)2 v	For off-sita facilities, the waste analysis that hazardous waste generators have agreed to supply?	<u> </u>
7:26-9.4(b)2v11	Procedures which will be used to identify changes in waste atream characteristics?	<u> </u>
	Does hazardous waste come to this facility from an outside source? (e.g., another generator).	
	If was like the same(s) of successions	

7:26-9.4(b)4	If waste comes from an outside source, are there procedures in the waste analysis plan to insure that waste received conforms to the accompanying manifest?	
	Does the plan describe: No waste rec	sieved from off silv
7:26-9.4(b)41	The procedures which will be used to determine the identity of each shipment of waste managed at the facility?	
7:26-9.4(b)411	The sampling method which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling?	
7:26-9.4(c)1	Did the facility accept hazardous waste which it is not authorized to handle?	
7:26-9.4(1)	Are all records and results of waste analysis performed pursuant to NJAC 7:26-9.4(b) and 9.4(e) as applicable written in the operating log?	<u> </u>
7:7:26-9.4(h)	Security	
	Does the facility have:	
7:26-9.4(h)11	A 24 hour surveillance system which continuously monitors and controls entry onto the active portion of the facility?	<u> </u>
7:26-9.4(h)111	An artificial or natural barrier, which completely surrounds the active portion of the facility; and a means to control entry, at all times, through the gates or other entrances to the active portion of the facility?	<u> </u>
7:26-9.4(h)3	Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?	<u> </u>
	If no, explain what measures are taken	

7:26-9.4(f)	General Inspection Requirements	
7:26-9.4(f)1	Does the owner or operator inspect the facility for malfunctions and deterioration, operator errors and discharges which may be causing, or may lead to:	
7:26-9.4(f)11	Discharge of hazardous waste constituents to the environment?	<u> </u>
7:26-9.4(f)111	A threat to human health?	
7:26-9.4(f)3	Has the owner or operator developed, and does the owner or operator follow a written schedule for inspecting monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that are utilized for the prevention, detection or response to environmental or human health?	
	:	<u>~</u>
7:26-9.4(f)31	Did the owner or operator submit the written inspection schedule to the department?	<u> </u>
	If yes, when was it submitted?	
7:26-9.4(f)3111	Is the written inspection schedule kept at the facility?	<u> </u>
7:26-9.4(f)31v	Does the schedule identify the types of problems to be looked for during the inspection?	<u> </u>
7:26-9.4(f)3v	Does the schedule include the frequency of inspection, based upon the rate of possible deterioration of the equipment and the prohability of an environmental, or human health incident if the deterioration or malfunctions or any operator error goes undetected between inspections?	<u> </u>
7:26-9.4(f)5	Is there evidence that problems reported in the inspection log have not been remedied?	
7:26-9.4(£)6	Does the owner/operator record inspections in a log?	<u> </u>

		120 110 1171
7:26-9.4(f)6	Are these records kept for at least three (3) years from the date of inspection?	<u> </u>
7:26-9.4(f)6	Does the records include the date, and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial action?	<u> </u>
7:26-9.4(g)	Personnel Training	
	Have facility personnel successfully completed a program of classroom instruction or on-the-job training within six months of having been employed?	<u> </u>
7:26-9.4(g)2	Is the program directed by a person trained in hazardous waste management procedures and does it include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed	: !
7:26-9.4(g)5	If yes, have facility personnel take part in an annual review of training	
	Is there written documentation of the following:	
7:26-9.4(g)61	Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job?	
7:26-9.4(g)611	A written job description for each position related to hazardous waste management?	·
7:26-9.4(g)6111	A written description of the type are amount of both introductory and continuing training given to persons in jobs related to hazardous waste management?	
7:26-9.4(g)61v	Documentation of actual training or experience received by personnel?	

7:26-9.4(g)7	Are training records kept on all current employees until closure of the facility and training records kept on former employees for three years from their last date of employment?	<u> </u>
7:26-9.4(g)8	Are semi-annual drills conducted involving all employees and appropriate local authorities to test emergency response capabilities at the facility in accordance with the contingency plan and emergency procedures development pursuant to NJAC 7:26-9.7?	
7:26-9.6	Preparedness and Prevention	
	Does the facility comply with preparedness and prevention requirements including maintaining:	
7:26-9.6(b)1	An internal communications or alarm system?	<u> </u>
7:26-9.6(b)2	A telephone or other device to summon emergency assistance from local authorities?	<u> </u>
7:26-9.6(b)3	Portable fire equipment, spill control equipment, and decontamination equipment?	<u> </u>
7:26-9.6(b)4	Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems?	<u>/</u>
7:26-9.6(c)	Is equipment tested and maintained?	
7:26-9.6(d)1	Is there immediate access to communications or alarm systems during handling of hazardous waste?	<u> </u>
7:26-9.6(e)	Adequate aisle space to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment?	

If no, please explain.

	In your opinion, do the types of waste on site require all of the above procedures, or are some not required?	<u> </u>
	Explain.	
7:26-9.6(f)	Has the facility made the following arrangements, as appropriate for the type of waste handled on site?	
7:26-9.6(f)1	Familiarize police, fire departments and emergency response teams with the layout of the facility and hazardous waste handled?	<u> </u>
7:26-9.6(f)2	Where more than one police and fire department might respond to an emergency, is there an agreement designating primary emergency authority to a specific police or fire department, end agreemente with any others to provide support to the primary emergency authority?	<u>/</u>
7:26-9.6(f)3	Agreements with emergency response contractors, and equipment suppliers?	<u> </u>
7:26-9.6(f)4	Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility end the types of injuries or illnesses which could result from fires, explosions, or discharges at the facility?	<u> </u>
7:26-9.6(f)5	Arrangements with local fire departments to inspect the facility on a regular basis with at least two inspections annually?	
7:26-9.7	Contingency Plan and Emergency Procedures	1
7:26-9.7(a)	Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions, hazards to human health or environment, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface	. /

7:26-9.7(b)	Are provisions of the plan carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?	<u> </u>
7:26-9.7(c)	Does the contingency plan describe the actions facility personnel shall take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituenta to air, soil, or surface water at the facility?	<u></u>
7:26-9.7(d)	Did the owner or operator prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 or 151 or a Discharge Prevention, Containment and Countermeasure (DPCC) Plan in accordance with NJAC 7:1E-4.1 et seq.? If yes, did the owner or operator amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with	
7:26-9.7(e)	the requirements of this section? Does the plan describe arrangementa agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services?	
7:26-9.7(f)	Does the plan list names, addressea, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and is this list kept up-to-date? Where more than one person is listed, one shall be named as primary emergency coordinator and others shall assume responsibility as alternates?	<u> </u>

7:26-9.7(g)	Does the plan include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required? Is the list kept up-to-date? In addition, does the plan include the location and a physical description of each item on the list, and a brief outline of its capabilities?	
7:26-9.7(h)	Does the plan include an evacuation procedure for facility personnel where there is a possibility that evacuation could be necessary? Does this plan describe signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires)?	
7:26-9.7(1)	Is a copy of the contingency plan and all revisions to the plan: 1. Maintained at the facility; and 2. Has the contingency plan been	<u> </u>
	submitted to local authorities (police, fire departments, emergency response teams)?	· <u> </u>
7:26-9.7(k)	Is there at least one employee on eite or on call with the responsibility of coordinating all emergency response measures?	<u> </u>
7:26-9.8	Closure Plan	
7:26-9.8(c)	Does the facility have a written closure plan?	
	Does the owner/operator keep a written copy of the closure plan and all revisions to the plan at the facility?	

If yes, does the plan include:

	 	- -
7:26-9.8(e)1i	A description of how and when the facility will be partially closed (if applicable) and ultimately closed?	<u> </u>
7:26-9.8(e)111	The maximum extent of the operation which will be open during the life of the facility?	<u> </u>
7:26-9.8(e)2	An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the life of the facility?	<u> </u>
7:26-9.8(e)3	A description of the steps needed to decontamination facility equipment during closure?	
7:26-9.8(e)4	A schedule for final closure including the anticipated date when the wastes will no longer be received, the date when completion of final closure is anticipated, and intervening milestone dates which will allow tracking of the progress of closure?	<u> </u>
	Post Closure Plan	
7:26-9.9(g)	Does the facility have a written post-closure plan kept at the facility?	
	If yes, does the plan:	
7:26-9.9(1)	Identify the activities which will be carried on after closure and the frequency of these activities?	
7:26-9.9(1)1	Include a description of the planned ground water monitoring activities and frequencies at which they will be performed?	
7:26-9.9(1)2	Include a description of the planned maintenance activities, and frequency at which they will be performed, to insure the following:	
7:26-9.9(1)21	The integrity of the cap and final cover or other containment structures where applicable?	
7:26-9.9(1)211	Describe the function of the facility monitoring equipment?	

7:26-9.9(1)3

Include the name, address and phone number of a person or office to contact about the disposal facility during the post-closure period?

Does the owner/operator have a written estimate of the cost of post-closure for the facility?

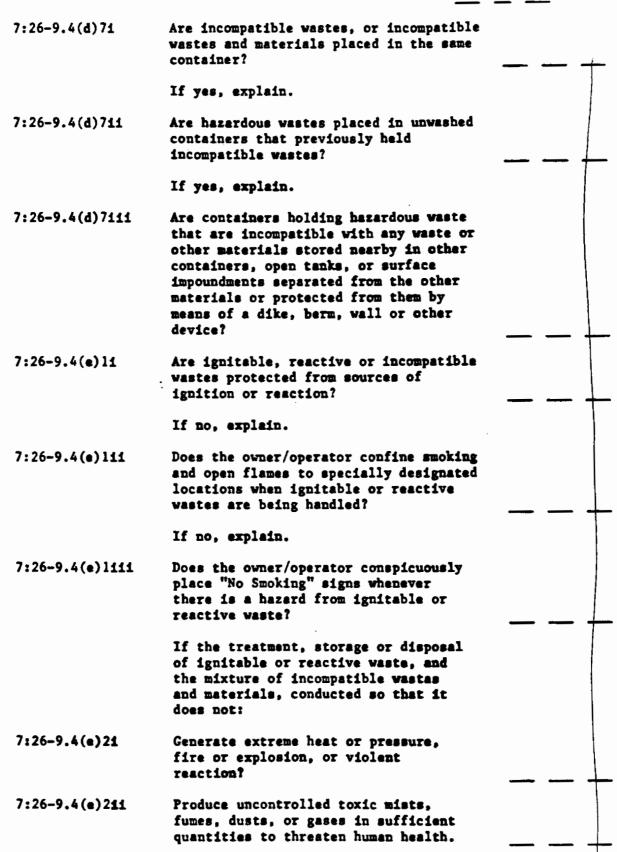
If yes, what is it?

If no, explain.

Please circle all appropriate activities and answer questions in appropriate sections all activities circled.

Storage	Treatment	Disposal
Container	Tank -	Landfill
Tank, Above Ground	Surface Impoundments	
Tank, Below Ground	Incineration	Surface Impoundments
Surface Impoundment	ts Thermal Treatment	Other
Waste Pilea		
Other	Chemical, Physical and B	iological Treatment
Other		·
7:26-9.4(d)	Containers	
	What type of containers are used atorage? Describe the size, typ	
	quantity and nature of wastes (e 12 fifty-five gallon drums of wastes)	
	acetone).	use.
7:26-9.4(d)11	Do the containers appear to be of sturdy leakproof construction of	
	adequate wall thickness, weld, he and seam strength, and of suffice	inge
	material strength to withstand s	ide and
	bottom shock, while filled, with impairment of the container's ab	
	to contain hazardous waste?	<u> </u>

7:26-9.4(d)111	Are the lids, caps, hinges or other closure devices of sufficient strength that when closed, they will withstand dropping, overturning or other shock without impairment of the container's ability to contain hazardous waste? If no, explain.	+
7:26-9.4(d)2	Do the containers appear to be in good condition, not in danger of leaking?	
7:26-9.4(d)2	If not, please describe the type, condition and number of leaking or corroded containers. Be datailed and specific.	
7:26-9.4(d)3	Are hazardous wastes stored in containers made of compatible materials?	
7:26-9.4(d)41	Are all containers securely closed, except those in use, so that there is no escape of hazardous waste or its vapors?	
	If no, explain.	
7:26-9.4(d)4111	Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking?	
	If no, explain.	
7:26-9.4(d)iv	Are containerized hazardous wastes segregated in storage by waste type?	
7:26-9.4(d) v	Are containerized hazardous wastea arranged so that their identification label is visible?	
7:26-9.4(d)5	Does the owner/operator inspect the container storage area at least daily, looking for leaks and for deterioration caused by corrosion or other factors?	
7:26-9.4(d)6	Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?	



	 .		_		
7:26-9.4(e)2iii	Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk or fire or explosion?		_	4	_
7:26-9.4(e)21v	Damage the structural integrity of the device or facility containing the waste?	_		4	
7:26-9.4(a)2v	Threaten human health or the environment?	_	_	1	_
7:26-11.2	Tanks			ı	
	What are the approximate number and size of tanks containing hazardous waste?	_		<u> </u>	/
	Identify the waste treated/stored in each tank.				
	General Operating Requirements				
7:26-11.2(a)2	Are hazardous wastes or treatment reagents placed in the tank that could cause the tank or its inner liner to rupture, leak or corrode?			1	
	If yes, please explain.				
	Are there leaking tanks?	_		1	
7:26-11.2(a)2	Are all hazardous wastas or treatment reagents being placed in tanks compatible with the tank material so that there is no danger or ruptures, corrosion, leaks or other failures?				
7:26-11.2(3)	Do uncovered tanks have at least two feet of freeboard or an adequate containment structure?				
7:26-11.2(a)4	If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank, e.g., bypass system to a standby tank?				
7:26-11.2(c)	Inspections				
	Is the tank(s) inspected for:				
	1. Discharge control equipment (each operating day).				

7:26-11.3(a)	Is there at least two feet of freeboard in the impoundment?	
7:26-11.3(b)	Do all earthen dikes have a protective cover to preserve their structural integrity?	
	If yes, please specify the type of covering.	-
7:26-9.4(c)1	Does the owner/operator have a detailed chemical and physical analysis of a representative sample of the waste in the impoundment?	
7:26-9.4(1)	Does the owner/operator place the results from each waste analysis and trial test, or the documented information, in the operating record of the facility?	
7:26-11.3(d)	Does the owner or operator inspect:	
7:26-11.3(d)1	The freeboard level at least once each operating day to ensure compliance with subsection 11.3(a)?	
7:26-11.3(d)2	The surface impoundment, including dikes and vegetation surrounding the dike, at least once a week to detect any leaks, deterioration or failures in the impoundment?	
7:26-11.3(f)	Is ignitable or reactive waste placed in the surface impoundment?	
7:26-11.3(f)1	If yes, is the waste treated, rendered, or mixed before or immediately efter placement in the impoundment?	
7:26-11.3(f)11	Does the resulting waste, mixture, or dissolution of material no longer meet the definition of ignitable or reactive waste?	

	-	_
7:26-11.3(f)111	Is the waste treated, rendered or mixed so that it does not:	
7:26-9.4(e)21	Generate extreme hest or pressure, fire or explosion, or violent reaction?	+
7:26-9.4(e)211	Produce uncontrolled toxic mists, fumes, dusts, of gases in sufficient quantities to threaten human health?	
7:26-9.4(e)2iii	Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion?	
7:26-9.4(e)2iv	Damage the structural integrity of the device or facility containing the waste?	
7:26-9.4(e)2v	Threaten human health or the environment?	
7:26-11.3(f)2	Is the surface impoundment used solely for emergencies?	
7:26-11.3(g)	Are incompatible wastes, or incompatible wastes and materials placed in the same surface impoundment?	
	If yes, is the waste managed so that it does not:	
7:26-9.4(e)21	Generate extreme heat or pressure, fire or explosion, or violent reaction?	
7:26-9.4(e)211	Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health?	
7:26-9.4(e)2111	Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk or fire or explosion?	
7:26-9.4(e)21v	Damage the structural integrity of the device or facility containing the waste?	
7:26-9.4(e)2 v	Threaten human health or the environment?	
7:26-11.4	Landfills	
	Identify the types of waste and size of the landfill.	NA
	General Operating Requirements	/ - /
7:26-11.4(a)1	Is run-on diverted away from all portions of the landfill?	

	IES NO N/A
7:26-11.4(a)2	Is runoff from active portions of the landfill collected?
7:26-11.4(a)3	Is waste which is subject to wind dispersal controlled?
	Please explain how.
7:26-11.4(a)4	Does waste disposal or the disposal operation occur within 200 feet (60.6 meters) of the property boundary?
7:26-11.4(a)6	Are untreated, ignitable, or reactive wastes placed in the landfill?
	If yea, explain.
7:26-11.4(a)7	Are incompatible wastes, or incompatible wastes and materials placed in the same hazardous waste landfill cell?
	If yes, explain.
7:26-11.4(a)8	Are bulk or non-containerized liquid waste or waste containing free liquids placed in a hazardous waste landfill?
	If yas:
7:26-11.4(a)81	Does the hazardous waste landfill have a liner which is chemically and physically resistant to the added liquid and a functioning leachate collection and removal system with a capacity aufficient to remove all leachate produced?
7:26-11.4(a)811	Before disposal, is the liquid waste or waste containing free liquids treated or stabilized, chemically or physically, so that free liquids are no longer present?
7:26-11.4(a)9	Are containers holding liquid waste or waste containing free liquids placed in a hazardous waste landfill?
	If yes:
7:26-11.4(a)91	Is the container designed to hold liquids or free liquids for a use other than storage, such as a battery?

7:26-11.4(a)911	Is the container very small, such as an ampule?	 +-
7:26-11.4(a)10	Are empty containers crushed flat, shredded, or similarly reduced in volume before it is buried beneath the surface of a hazardous waste landfill?	
7:26-11.4(a)11	Does the owner or operator of a hazardous waste landfill continue to dispose of hazardous wastes subsequent to the detection of any liquid, in the secondary collection system?	
7:26-11.4(b)	Does the owner or operator of a hazardous waste landfill maintain an operating record required in NJAC 7:26-9.4(i)?	_ +
7:26-11.4(b)1	Does the owner/operator maintain a map, the exact location and dimensiona, including depth of each cell with respect to permanently aurveyed bench marks?	_
7:26-11.4(b)2	The contents of each cell and the appropriate location of each hazardous waste type within each cell?	
	Are containers holding liquid waste or waste containing free liquids placed in the landfill?	
	Please describe the types and contents of such containers placed in the landfill.	
	Are empty containers placed in the landfill crushed flat, shredded or similarly reduced in volume before they are buried?	
	Are small containers of hazardous waste in overpacked drums placed in the landfill?	
	If yes, please describe precautions taken to prevent the release of the waste.	,
7:26-11.5	Incinerator	^
	What type of incinerator is at the site (e.g., waterwall incinerator, boiler, fluidized bed, etc.).	VH

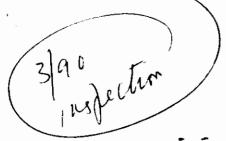
	Is the residue from the incinerator a hazardous waste?			-	
	What types of air pollution control devices (if any) are installed in the incinerator unit?				
	Is energy recovered from the process?			+	-
	If yes, describe.				
	What is the destruction and removal efficiency for the organic hazardous waste constituents?				
7:26-11.5(b)1	Does the operating record include additional analysis and to datermina types of pollutants which might be emitted including:				
7:26-11.5(b)11	Heating value of the waste?			1	_
7:26-11.5(b)111	Halogen and sulfur content?	_		1	
7:26-11.5(b)1iii	Concentrations of lead and mercury?			1	_
7:26-11.5(2)	If no to any of the above questions, is there justification and documentation?	_			_
	If operating, does it appear the incinerator is operating at steady state for conditions of operation, including temperature and air flow?	_			_
	Monitoring and Inspection				
7:26-11.5(c)1	Are existing instruments relating to combustion and emission controls monitored every 15 minutes?	_			_
	If no, explain.				
7:26-11.5(e)1	Does the incinerator have all the following instruments for measuring: Wastefeed, auxiliary fuel feed air flow, incinerator temperature scrubber flow, and scrubber pH? (Circle Missing Instruments).		<u></u>		
	If no, explain.				
7:26-11.5(c)2	Is the stack plume observed visually at least hourly for opacity and color?				

7:26-11.5(c)3	Are there any signs of leaks, spill and fugitive emission associated with the pumps, valves, conveyors, pipes, etc.?	+
	If yes, describe.	
7:26-11.5(c)3	Are all emergency shutdown controls and system alarms checked to assure proper operation?	
	Is there any reason to believe the incinerator is being operated improperly? i.e., steady state conditions are not maintained.	
	If yes, explain.	
7:26-11.5(c)3	Is the incinerator inspected daily?	
7:26-11.6	Thermal Treatment	,
	What type of thermal treatment is at the site (e.g., waterwall incinerator, boiler, fluidized bed, etc.).	NA
	List the types and quantities of hazardous waste thermally treated.	
	Is the residue from the thermal treatment unit a hazardous waste?	+
	What types of air pollution control devices (if any) are installed in the thermal treatment unit?	
	Is energy recovered from the process?	
	If yes, describe.	•
	What is the destruction and removal efficiency for the organic hazardous waste constituents?	
7:26-11.6(b)1	Does the operating record include additional analysis and to determine types of pollutants which might be emitted including:	
7:26-11.6(b)11	Heating value of the waste?	
7:26-11.6(b)111	Halogen and sulfur content?	
7:26-11.6(b)1111	Concentrations of lead and mercury?	
		j

7:26-11.6(2)	If no to any of the above questions, is there justification and documentation?
	If operating, does it appear the thermal treatment unit is operating at steady state for conditions of operation, including temperature and air flow?
	Monitoring and Inspection
	Are existing instruments relating to combustion and emission controls monitored every 15 minutes?
	If no, explain.
7:26-11.6(c)1	Does the thermal treatment have all the following instruments for measuring: Wastefeed, auxiliary fuel feed air flow, incinerator temperature scrubber flow, and scrubber pH? (Circle Missing Instruments).
	If no, explain.
7:26-11.6(c)2	Is the stack plume observed visually at least hourly for opacity and color?
7:26-11.6(c)3	Are there any signs of leaks, spills and fugitive emission associated with the pumps, valves, conveyors, pipes, etc?
	If yes, describe.
7:26-11.6(c)3	Are all emergency shutdown controls and system alarma checked to assure proper operation?
	Is there any reason to believe the thermal treatment unit is being operated improperly? i.e., steady state conditions are not maintained.
	If yes, explain.
7:26-11.6(c)3	Is the thermal treatment inspected deily?
7:26-11.6(e)	Is there open burning of hezerdous waste?
	If yes, what is being burned? (Only burning or detonation of explosives is permitted).

If open burning or detonation of explosives is taking place, approximately what is the distance from the open burning or detonation to the property of others?

	or others:
7:26-11.7	Chemical, Physical and Biological Treatment
	(Other than in tanks, surface impoundments or plant treatment facilities).
	Describe the treatment system at this facility and the types of wastes treated.
7:26-11.7(a)2	Does the treatment process system show any signs or ruptures, leaks or corrosion?
	If yes, describe.
7:26-11.7(a)3	Is there a means to stop the inflow of continuously fed hazardous wastes?
	Inspections
7:26-11.7(c)1	Is the discharge control safety equipment (e.g., waste feed cut-off systems, bypass systems, drainage systems and pressure relief systems) in good working order?
7:26-11.7(c)1	Are they inspected at least once each operation day?
7:26-11.7(c)2	Does the data gathered from the monitoring equipment (e.g., pressure and temperature gauges) show treatment process is operating according to design?
7:26-11.7(c)2	Is data gathered at least once each operating day?
7:26-11.7(c)3	Are construction materials of the treatment process inspected at least weekly to detect corrosion or leaking of fixtures and seams?
7:26-11.7(c)4	Are the discharge confinement structures (e.g., dikes) immediately surrounding the treatment unit inspected at least weekly to detect erosion or obvious signs of leakage (e.g., wet spots or dead vegetation).



Facility Name:	
ID Number:	
Inspector:	FeliceTTI
Date: 3/13	140

DRAFT RCRA LAND RESTRICTION TREATMENT, STORAGE, AND DISPOSAL REQUIREMENTS CHECKLIST

I.	FACI	LITY IDENTIFICATION			
	H_{i}	en Kel Corp.		Berry Ave at	RIS 17/V other identifier)
Ā.				• • • • • • • • • • • • • • • • • • • •	
	Car	Istudi	N5	<u> </u>	Bergen
	•		<u>^</u>		
_	<u>Sp</u>	ecially Characthemic re of business; identifi	al ManutacTure		
G.	na tu rele	re of pusiness; identifi vant SIC codes	ication of industr	rial and vaste manageme	ent operations;
	1	JO 002017719			
Ħ.		"		C: 2/	·
	Her	herT Talamini lity Contact (Name and)		(201) 93-	33200
ī.	Faci	lity Contact (Name and)	Phone Number)		
II.	Α.	For onsite facilities,	complete the gene	erator checklist	Comments
	В.	General Facility Stands	ards		
1.	Gen	eral			
	a.	Does the facility conductors on site or through	uct waste analysis gh a commercial la	s (total and aboratory?	
	ъ.	Describe the frequency facility.	of sampling conductions of wast	ucted by the 5 - MOST was Te is of	ff-spec. product.
2.	Tre	atment Facilities			gg gggdddddd 1 tei
	a.	Has the treatment facilianalysis plan [\$268.7(of \$264.13 or \$265.13?	b) to meet the re	vaste equirements YesNo*	
		tests for vastes (i.e., those pro	ros expresseo as '	endix A bject to $-\mathcal{N}A$	

* A potential violation is indicated

TSDF-1

			Facility Name: ID Number: Inspector: Date:
	c.	and dates that wastes exceeding treatment starentered and were removed from storage 15264.7	ndards 3 or
	d.	\$265.73]? Yes Do operating records agree with container lab [\$268.50(a)(2) or \$264.73 or \$265.73]	
		<u>√</u> Yes	No*
	€.	Is vaste exceeding treatment standards stored less than 1 year? Yes	No
		If yes, can you show that such accumulation i necessary to facilitate proper recovery, trea or disposal? Yes	tment,
		If yes, state how:	
	f.	Was/is waste exceeding treatment standards st for more than one year?Yes	ored <u>V</u> No
		If yes, state the owner/operator's proof that storage was solely for the purposes of accumu of such quantities of hazardous waste as are necessary to facilitate proper recovery, tres or disposal:	lation
D.	Trea	atment in Surface Impoundments (\$268.4)	
1.		prohibited wastes placed in surface impoundment treatment? Yes	No NA
	If 1	no, go to E.	
2.	imp	the only recognizable "treatment" occurring in oundment either evaporation, dilution, or both 68.4(b) and \$268.3]?Tes*	1
3.	vit req	the facility submit a certification of compline the facility submit a certification of compline the facility submit a ground vater monitor uirements, and the vaste analysis plan to the facy [\$268.4(a)(4)]?	
4.		e the minimum technology requirements n met [\$268.4(a)(3)]?Yes	No*
	a.	If the minimum technology requirements have been met, has a vaiver been granted for that unit(s) [\$268.4(a)(3)(iii)]?Yes	No*
* A	p: t e	ntial violation is indicated	

TSDF-3

Comments

	Date:_
5.	Have the Subpart P-ground-water monitoring requirements been met [\$268.4(a)(3)]?YesNo*
6.	Have representative samples of the sludge and supernatant from the surface impoundment been tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan and are the results in the operating record for all wastes with treatment standards or prohibition levels [§268.4(a)(2)]? Yes No*
7.	Did the hazardous waste residue (sludge or liquid) exceed the treatment standards or prohibition levels? YesNo
8.	Provide the frequency of analyses conducted on treatment residues:
	Does the frequency meet the requirements of the waste analysis plan [§264.13 or §265.13]? Yes No*
9.	Does the operating record adequately document the results of waste analyses performed [\$264.13 or \$265.13]? Yes No*
10.	Have the hazardous waste residues that exceed the treatment standards and/or prohibition levels been removed adequately and on an annual basis [\$268.4(a)(2)(ii)]?
	a. If answer to 6 is no and supernatant is determined to exceed treatment concentrations, is annual throughput greater than impoundment volume? (note: sludge exceeding treatment standards must be removed) YesNo
11.	If residues were removed annually, were adequate precautions taken to protect liners and do records indicata that inspections of liner integrity are performed? Tes No
12.	When removed, were residues of restricted wastes managed subsequently in another surface impoundment?
	a. Were these residues subject to a valid 268.8 certification?YesNo*
13.	When removed, were wastes treated prior to disposal?YesNo

a. If yes, are waste residues treated on or offsite?

Onsite Offsite
TSDF-4

Facility Name:
ID Number:
Inspector:

Comments

		Facility ID Number Inspector Date:
b.	Identify management method	
Tre	etment	
	s the facility operate treatment units (regumpt) (not including surface impoundments)?Yes	lated or No
Ιf	no, go to "F."	
	cribe the treatment processes, including execesses.	
Doe	s the facility treat soft hammered wastes?	No
e.	generator's cortification/demonstration	in the
ь.	Did the treatment facility certify he treat soft hammered waste as per the generator's stration and maintain copies of all certification [268.8(c)(1)]?	demon-
c.	Did the treatment facility send a copy of t generator's demonstration and certification receiving treatment, recovery, or storage f [§268.8(c)(2)]?	to the
v as fro	s the facility, in accordance with an accept te analysis plan, verify that the residue ex m all treatment processes for the restricted less than treatment standards or prohibition	tract Vastes
lev	els [\$268.7(c)(2)]?Yes	No*
Des	cribe frequency of testing of treatment resi	duals.
	dilution used as a substitute for treatment	

TSDF-5

* A potential violation is indicated

Comments

		Inspector:	
		Date:	
			Comments
7.	Are all notifications, certifications, and result waste analyses kept in the operating record [\$264 or \$265.73(b)]? Yes	.73(b)	
8.	Are notices provided to land disposal facilities plets with Waste Number, treatment standard, maninumber, and analytical data (where available) subfor each shipment of waste or treatment residual meets the treatment standard stating that waste here treated to treatment performance standards [§268.7(b)(4) and (5) and §268.8(c)(1)]?	fest mitted that	
9.	If the waste or treatment residue will be further managed at another storage or treatment facility, the treatment facility complied with the 268.7(a) notification and certification requirements applit to generators [§268.7(b)(6)]?	has	
r.	Land Disposel		
1.	Are restricted and/or prohibited wastes placed in disposel units (landfills, surface impoundments** piles, wells, land treatment units, salt domes/be mines/caves concrete vault or bunker?) Yes	veste eds,	
2.	Did facility have the notice and certification frequency frequency in its operating record that prohibited wastes disposed met standards for general prohibited vastes (\$\$266.7(c)(1); 268.7(a),(b)]? Yes	all eration	
3.	Did the facility obtain waste analysis data throutesting of the waste to determine that the waste in compliance with the applicable treatment stand [§268.7(c)(2)] If yes, was the frequency of testing as required	s are dards No*	
	facility's waste analysis plan [\$264.13 or \$265.]		
4.	Were prohibited wastes exceeding the applicable ment standards or prohibition lavels placed in lidisposal units [268.30] excluding national capacitations [268.30(a)]?	and	
	If yes, did facility have an approved valver base no migration petition [268.6] or approved case-by or capacity extension [268.5] or treatment stands variance [268.44][§268.30(d), §268.31(d), §268.35§268.33(e)]?	y-case ard	
	potential violation is indicated not include SIs addressed under Section "D" of the checklist.	his	

Facility Name: ______ID Number: ______

TSDF-6

		Facility Name:
		ID Number: Inspector:
		Date:
		Comments
5.	Were restricted wastes subject to a national cap variance or case-by-case extension disposed? Yes	acity No
	The way have the statement technology manufact	
	If yes, have the minimum technology requirem been met for all units receiving such wastes [§268.30(c), §268.31(c), §268.32(d), §268.33Yes	l
6.	Were adequate records of disposal maintained [\$264.73(b) or \$265.73(b)]?Yes	No*
7.	If wastes subject to a nationwide variance, case case extensions [268.5], or no migration petitic [268.6] were disposed, does facility have general notices [268.7(a)(3)] and records of disposal? [\$264.73(b) or \$265.73(b)]	ons ator's
8.	If the facility has a case-by-case extension, case inspector verify that the facility is making proas described in progress reports? Yes	ogress
9.	If the owner/operator is disposing of a soft-har waste, is he maintaining the generators and tree (if applicable) notices and certifications [§268.8(a)(2)-(a)(4)]? Yes	aters
	 a. Is the facility disposing of any soft hammed that may be classified as California wastes: Yes 	?
	b. Did the facility seek to verify whether the vastes may be subject to all restrictions, California ban? Yes	e.g.,
* A	potential violation is indicated TSDF-7	
	West Orange, N.J. 07052	
	(201) 669-3960	•
NOTICE OF VIOLATION		
1	ID NO. 1/JD 002012219	DATE 3/13/90
	NAME OF FACILITY HENTE Corp.	
,	NAME OF FACILITY HENTE Corp.	(Carlo 14dt NJ 07072
	LOCATION OF PACILITY TO THE TOTAL TO	
	NAME OF OPERATOR HEIDERT Salamin)	

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following